



Environment
Agency



IED & Large Combustion Plant

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Introduction

- ⇒ How IED affect new & existing LCPs
- ⇒ What EA is doing to minimise uncertainties
- ⇒ I will cover:
 - ⇒ LCP BRef & BAT conclusions
 - ⇒ IED requirements – some new issues
 - ⇒ IED Interpretational Issues & communications
 - ⇒ Timing and reviewing permits

IED & BAT Conclusions

- ⇒ Chapter III – LCP requirements are minimum
- ⇒ BAT Conclusions shall be reference in setting permit conditions
- ⇒ BRef derives BAT Conclusions – TWG
- ⇒ Art.13 Forum – MS, NGOs, Industry etc.
- ⇒ Conclusions are adopted by Art.75 Committee
- ⇒ Permit ELVs shall not exceed BAT AELs
 - ⇒ Derogations ?

UK LCP BRef Process

- ➔ UK submitted 'wish list' to Commission in May
- ➔ Common UK position – agencies & industry
- ➔ Key issues
 - ➔ New & existing plant – all fuels
 - ➔ Cost & benefit
 - ➔ UK transition to low C generation
 - ➔ Primary abatement measures preferred
 - ➔ Load factors & projected plant life
 - ➔ CCS, CHP and being ready
 - ➔ Biomass
- ➔ BAT AELs and 19 supporting documents - evidence

Europe LCP Bref Process

- ➔ Starts October
- ➔ Richard Chase & industry reps for UK
- ➔ UK TWG feed back to LCP Stakeholders group
- ➔ BRef concludes 2013 or later
- ➔ BAT Conclusions adopted 2014 or 2015 ? – 4 years to comply

- ➔ For now UK LCP BAT as submitted to BRef

IED LCP requirements

- ⇒ ELVs – new 30(3) & existing 30(2)
 - ⇒ Common stack aggregation (not <15MW)
 - ⇒ Fuel interrupt derogations
 - ⇒ Not for diesel engines
 - ⇒ BAT review for non-commercial fuels by Dec.2013 – different ELVs ?
 - ⇒ CO ELVs for GTs

NB: Current 4(4) opt out may only be new plant

IED LCP requirements

- ➔ Transitional National Plan Art.32
 - ➔ Existing plant operating before Nov.2003
 - ➔ Plan for SO₂, NO_x & PMs – note still CO ELV for GTs
 - ➔ Not for refineries non-commercial fuel
 - ➔ Art.41 – TNP rules – calculation of annual emission – 2016 to 2020 June, then 30(2) ELVs
 - ➔ 2015 permit ELVs minimum to be maintained
 - ➔ UK to confirm TNP plant before end 2012

IED LCP requirements

- ⇒ Limited Life Derogation Art.33
 - ⇒ Existing plant operating before Nov. 2003
 - ⇒ 17,500 hours 2016 to end 2023
 - ⇒ 2015 permit ELVs minimum to be maintained
 - ⇒ Operators to confirm LLD plant before end 2013

IED LCP requirements

- ➔ Annex V ELV derogations
 - ➔ Existing plant operating before Nov.2003
 - ➔ Less than 1,500 hrs / year as a 5 year rolling average
 - ➔ Can be for part of a plant / common stack
- ➔ GT for emergency use < 500 hrs a year
 - ➔ No IED ELVs

IED LCP Consistency in the UK

⇒ LCP Stakeholders Group

- ⇒ Defra Chair, periodic meetings

- ⇒ Trade bodies, agencies, DAs, operators & NGOs

⇒ Interpretational Issues for IED Implementation

- ⇒ Replaces JEP Framework & will be for some 350 UK LCPs

- ⇒ More than just JEP & AEP

- ⇒ Definitions & protocols e.g. Mixed Techniques, Start up & Shut down, Break down, Monitoring.

Timescales

- ➔ 6 January 2011 – IED came into force - EC published in the Official Journal (2010/75/EU)
- ➔ January 2013
 - ➔ transposition by Member States (via EPR)
 - ➔ applies to new installations
- ➔ Jan. 2013 - applies to existing installations (except LCPs)
- ➔ June 2015 - applies to new Annex 1 activities
- ➔ 1 January 2016 - applies to existing LCPs

Derogation Timescales

- ➔ TNP – notified to EC by 01/01/2013
- ➔ LLD – Notify CA by 01/01/2014

Permitting Time Scales

- ➔ BAT Conclusions adopted < 2015, IED & BAT review in 2015 for 1/1/2016.
- ➔ BAT Conclusions adopted > 2015, IED permit review in 2015 for 1/1/2016 including ELVs for ex NERP plant opting for TNP or LLD **and** a BAT review asap to allow 4 years to comply